

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 22 C 5536
	)	
SUMMIT ARCHITECTURAL METALS,	)	JUDGE JOHN R. BLAKEY
LLC, an Illinois limited liability company,	)	
	)	
VINCENT CAMPBELL,	)	
an individual,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF JUDGMENT**

Plaintiffs, by and through their attorneys, default having been entered against the Defendant on November 28, 2022 [Dkt. 14], request this Court enter judgment against Defendant, SUMMIT ARCHITECTURAL METALS, LLC, an Illinois limited liability company, pursuant to F.R.Civ.P. Rule 55(b). In support of this Motion, Plaintiffs state:

1. On November 28, 2022, this Court entered default against Defendant, SUMMIT ARCHITECTURAL METALS, LLC, an Illinois limited liability company.
2. Defendant submitted its monthly fringe benefit contribution reports for the time periods June 2021, July 2021, and September 2021 through January 2022. These reports indicate Defendant is delinquent in contributions, liquidated damages, and interest to the Funds in the amounts set forth below:

<u>Fund</u>	<u>Contributions</u>	<u>Liquidated Damages</u>	<u>Interest</u>
Mid-America Pension	\$12,456.66	\$4,747.59	\$2,175.81
Supplemental Monthly Annuity	\$13,654.04	\$3,778.95	\$1,731.72
Local 444 Apprentice Training	\$ 899.00		
WGIAT	\$ 161.82		

(See Affidavit of Paul E. Flasch).

3. Additionally, Defendant untimely paid its fringe benefit contributions due for the months of September 2021 through November 2021, and accordingly, has incurred liquidated damages and interest in the following amounts:

<u>Fund</u>	<u>Contributions</u>	<u>Liquidated Damages</u>	<u>Interest</u>
Mid-America Pension		\$240.50	\$110.24
Supplemental Monthly Annuity		\$ 53.36	\$ 24.26

(Flasch Aff. Par. 3(d)).

4. In lieu of submission of monthly fringe benefit contribution reports for the payroll period December 1, 2021 through April 1, 2023, Defendant submitted payroll records indicating hours worked by five of its employees, and accordingly, the Funds have calculated the following amounts due for contributions, liquidated damages, and interest as follows:

<u>Fund</u>	<u>Contributions</u>	<u>Liquidated Damages</u>	<u>Interest</u>
Mid-America Pension	\$4,826.00	\$1,085.85	\$497.68
Supplemental Monthly Annuity	\$1,016.00	\$ 228.60	\$104.78

5. In addition, Plaintiffs' firm has expended \$727.00 for costs and \$3,792.00 for attorneys' fees in this matter. (See Affidavit of Catherine M. Chapman).

6. Based upon the documents attached hereto, Plaintiffs request entry of judgment in the total amount of \$52,311.96

WHEREFORE, Plaintiffs respectfully request this Court to enter judgment in the amount of \$52,311.96.

/s/ *Rebecca L. Andruzzi*

Rebecca L. Andruzzi  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 1825  
Chicago, IL 60606-5250  
Bar No.: 6338666  
Telephone: (312) 216-2550  
Facsimile: (312) 236-0241  
E-Mail: [randruzzi@baumsigman.com](mailto:randruzzi@baumsigman.com)

I:\MIDJ\Summit Architectural\2022\motion for entry of judgment.rla.df.wpd

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that she mailed and e-mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 17th day of May 2023:

Summit Architectural Metals, LLC  
c/o Vincent Campbell, Registered Agent  
2542 N. Drake  
Chicago, IL 60647-1208  
[joe@summit-architectural-metals.com](mailto:joe@summit-architectural-metals.com)

/s/ *Rebecca L. Andruzzi*

Rebecca L. Andruzzi  
Attorney for the Plaintiffs  
BAUM SIGMAN AUERBACH & NEUMAN, LTD.  
200 West Adams Street, Suite 1825  
Chicago, IL 60606-5250  
Bar No.: 6338666  
Telephone: (312) 216-2550  
Facsimile: (312) 236-0241  
E-Mail: [randruzzi@baumsigman.com](mailto:randruzzi@baumsigman.com)

I:\MIDJ\Summit Architectural\2022\motion for entry of judgment.rla.df.wpd